

## REMARKS

Re-examination and allowance of the present application is respectfully requested.

Initially, Applicants thank the Examiner for indicating that the previously filed amendments overcome the prior 35 U.S.C. §101 rejection.

In the current final Office Action, claims 1-8 and 10-16 (incorrectly indicated as being claims 1-16 on page 2 of the Detailed Action portion of the Office Action, in view of the prior cancellation of claim 9) stand rejected under 35 U.S.C. §112, first paragraph as failing to comply with the written description requirement and the enablement requirement. By the current amendment, Applicants have revised independent claims 1 and 16, paying particular attention to the concerns raised by the Examiner. In view of the current amendments to claims 1 and 16, Applicants submit that the grounds for the 35 U.S.C. §112, first paragraph rejection no longer exist, and thus, respectfully requests withdrawal of this ground of rejection.

Claims 1-8, 10 and 12-16 stand rejected under 35 U.S.C. §103 as being obvious over U.S. Patent 6,654,031 to ITO et al. in view of U.S. Patent Application Publication No. 2002-0016707 to DEVOINO et al. Dependent claims 5 and 11 stand rejected under 35 U.S.C. §103 as being obvious over ITO et al. and DEVOINO et al, and further in view of Official Notice. Applicants respectfully traverse both grounds of rejection, submitting that the prior art combinations set forth in the final Office Action fail to render the presently claimed invention obvious.

The final Office Action asserts that ITO et al. discloses Applicants' claimed inputter, displayer and material data storage, but fails to disclose Applicants' claimed searcher, registrioner, and text string/CG conversion processor. However, the Office Action asserts that DEVOINO et al. discloses the searcher, the registrioner and the text string/CG conversion processor that are lacking

in ITO et al., and thus, it would have been obvious to one skilled in the art at the time of Applicants' invention to combine the teachings of ITO et al. and DEVOINO et al. to arrive at the instant invention defined by claims 1 and 16. Applicants respectfully disagree with this assertion.

Contrary to the Office Action's position that it would have been obvious to combine the teachings of ITO et al. with DEVOINO et al. to arrive at Applicants' claimed invention, Applicants submit that there is no teaching, suggestion or motivation in ITO et al. and DEVOINO et al. that would lead one to such a conclusion. Furthermore, even if one were to assume that the documents provide a teaching, suggestion and/or motivation (and Applicants submit they do not), it is submitted that neither ITO et al. or DEVOINO et al. discloses the essential components of the present claimed invention.

Independent claims 1 and 16, as presently amended, generally recites a technique for creating computer graphics of animation from text (i.e. text string data). According to the claimed invention, a text string/material correspondence table associates material data with material names (i.e. text strings) for the material data, and a hierarchical structural description describes features (i.e. text strings) of the material data in a hierarchical structure. (See, for example, paragraphs [0050] and [0052] of Applicants' Published Application No. 2008-0228713). When a feature (i.e. a new text string) of material data is input, the material data associated with the input feature is newly searched for, using an outer database that stores the material data, and the hierarchical structural description. The newly searched material data is stored, and the correspondence of the newly searched material data and the material name for the newly searched material data in the text string/material correspondence table is registered. When a material name is input, the material data associated with

the input material name using the text string/material correspondence table is acquired, and a computer graphics using the acquired material data is created.

Applicants submit that the features described above provide distinct advantages for creating computer graphics of animation from text (i.e. text string data), in which the process of creating computer graphics and the search for material data can be carried out in a sequence of operations and that newly searched material data can easily be used thereafter. See, for example, paragraphs [0011] and [0324]-[0326] of Applicants' U.S. Patent Application Publication No. 2008-0228713.

Applicants respectfully submit that this is not the case with the applied art of record. Applicants respectfully submit that ITO et al. discloses a video program editing method and a computer program product for displaying a video program as edited which are imparted with a capability or facility that in the course of creating as program or edition of images, image(s) viewed from other view point(s) desired by an operator and differing from the camera view point of the image being displayed can instantaneously be displayed, and which thus allows creation of a TV or video program, as well as edition-relevant works to be carried out in a simplified and facilitated manner within a significantly reduced time. See column 2, lines 27-39 of ITO et al. That is ITO et al. discloses a technique for editing video programs, which is fundamentally different from Applicants' present invention, which as noted above, is directed to creating computer graphics of animation from text (i.e. text string data).

DEVOINO et al. is directed to a computer system that automatically displays a graphic representation of a natural language text. Applicants submit that what DEVOINO et al. creates using computer graphics is fundamentally different from Applicants' instant invention. While it may appear that DEVOINO et al. and the presently claimed invention are both directed to computer

graphics, what is created by the computer graphics in DEVOINO et al. and the instant claimed invention are completely different. In particular, configurational differences exist between DEVOINO et al. and the present invention. It is thus submitted that DEVOINO et al. fails to disclose each and every feature of Applicants' invention, as defined by the claims

Specifically, Applicants submit that it is difficult to conclude that there is a link between the technical fields to which ITO et al. and DEVOINO et al. pertain, and the technical field of the present invention. Accordingly, Applicants submit that ITO et al. and DEVOINO et al. can not be considered to qualify as analogous prior art, as set forth in M.P.E.P. 2141.01(a)).

Given that ITO et al. and DEVOINO et al. are directed to fields of technology different from the presently claimed invention, and are directed to solving different problems, Applicants submit that the applied art of record fails to disclose any teaching, suggestion, or motivation for combining the references in the manner suggested by the Examiner.

In this regard, the Office Action asserts that DEVOINO et al. discloses the elements of the present invention that are not taught by ITO et al.; namely, Applicants' searcher, registration, and text string/CG conversion processor. Applicants respectfully disagrees, submitting that because DEVOINO et al. is not directed to animation from text, DEVOINO et al. fails to disclose character data, action data, set data and text string/material correspondence tables that are utilized to create computer graphics of animation from text, as taught by the presently claimed invention.

In particular, the Office Action asserts that semantic items unit 70, item processor unit 80 and graph unit 100 in DEVOINO et al. correspond to Applicants' claimed searcher; that model data unit 190 in DEVOINO et al. corresponds to Applicants' claimed registration; and that Figs. 3 and 4 of DEVOINO et al. teach Applicants' claimed text string/CG conversion processor. Applicants

disagree, submitting that DEVOINO et al. fails to disclose or suggest that the elements relied upon in the Office Action correspond to Applicants' claimed searcher, registration and text string/CG conversion processor. Applicants submit that the Office Action relies on impermissible hindsight in making such assertions. Accordingly, Applicants respectfully request that this assertion be withdrawn, or that the Office Action set forth, exactly how and in what manner the disclosure of DEVOINO et al. corresponds to the various elements of the present invention.

By the current response, Applicants further revise independent claims 1 and 16 to clarify the instant invention. While Applicants believe such clarification is not necessary, Applicants have done so for the purpose of advancing the prosecution of the present invention towards issuance. Specifically, Applicants have clarified the claims (using claim 1 as an example), that a correspondence table storage stores a text string/material correspondence table that associates material data with text strings that show material names for the material data. The claims are further clarified to recite that when a new text string that designates a feature of the material data is input from the inputter, the searcher newly searches for material data corresponding to the input feature, using an outer database that stores the material data, and a hierarchical structural description that describes the feature of the material data in a hierarchical structure. Furthermore, the registration stores the newly searched material data in the material data storage and registers a correspondence of the newly searched material data and a material name of the newly searched material data in the text string/material correspondence table. Similar revisions have been made to independent claim 16.

In view of the above, Applicants submit that even if one attempted to combine the teachings of ITO et al. and DEVOINO et al. in the manner suggested in the Office Action, one would fail to arrive at the presently claimed invention, as such combination would lack the features discussed

above. Accordingly, the Examiner is respectfully requested to withdraw the rejections set forth in the Office Action, indicate the allowability of the pending claims, and pass this application to issue.

Pursuant to M.P.E.P. §714.13, Applicants contend that entry of the present amendment is appropriate because the proposed amended claims avoid the rejections set forth in the last Office Action, resulting in the application being placed in condition for allowance, or alternatively, the revised claims place the application in better condition for purposes of appeal. Furthermore, the revised claims merely clarify the instant invention, and the amendment does not present any additional claims. Accordingly, entry of the present amendment is respectfully requested.

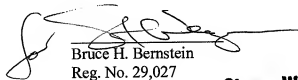
#### SUMMARY AND CONCLUSION

In view of the fact that none of the art of record, whether considered alone or in combination, discloses or suggests the present invention as now defined by the pending claims, and in further view of the above amendments and remarks, reconsideration of the Examiner's action and allowance of the present application are respectfully requested and are believed to be appropriate.

Should an extension of time be necessary to maintain the pendency of this application, including any extensions of time required to place the application in condition for allowance by an Examiner's Amendment, the Commissioner is hereby authorized to charge any additional fee to Deposit Account No. 19-0089.

If there should be any questions concerning this application, the Examiner is invited to contact the undersigned at the telephone number listed below.

Respectfully submitted,  
Koichi EMURA et al.



Bruce H. Bernstein  
Reg. No. 29,027

October 14, 2009  
GREENBLUM & BERNSTEIN, P.L.C.  
1950 Roland Clarke Place  
Reston, Virginia 20191  
(703) 716-1191

**Steven Wegman**  
**Reg. No. 31,438**